

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

DAVID FINNEY, an individual,)	
)	
Plaintiff,)	
)	
v.)	
)	CV. NO. 3:06-CV-622-WKW
)	
NISSAN NORTH AMERICA, INC.,)	
a foreign corporation; TAKATA U.S.A.)	
CORPORATION d/b/a TAKATA)	
CORPORATION, a foreign corporation,)	
Et al.)	
)	
Defendants.)	

**JOINT MOTION FOR EXTENSION OF
DEADLINE TO FILE JOINT STIPULATION OF DISMISSAL**

Now come Plaintiff and Defendants and request a ten-day extension to file a joint stipulation of dismissal in this case. In support of this motion, the parties state as follows:

1. The parties reached a settlement at mediation on January 29, 2008.
2. The Court subsequently issued an order giving the parties until February 19, 2008, to file a joint stipulation of dismissal.
3. The parties filed a Joint Motion for Extension of Deadline to File Joint Stipulation of Dismissal on February 19, 2008, which the Court granted, extending the deadline until March 4, 2008.
4. An additional extension until Friday, March 14 is requested to allow Defendants additional time to deliver the settlement proceeds to Plaintiffs.
5. The undersigned represents that he has contacted counsel for each party in this case, that all parties join in this motion, and that counsel for each party has given him permission

to file this motion with the Court on behalf of all parties.

WHEREFORE, the parties respectfully request a two-week extension of the deadline to file the joint stipulation of dismissal to allow them time to finalize the settlement release and to receive and deposit the settlement funds.

Respectfully submitted this 4th day of March, 2008.

KING & SPALDING LLP

/s/ Andrew T. Bayman
Andrew T. Bayman (*admitted pro hac vice*)
Georgia Bar No. 043342
Robert B. Friedman (*admitted pro hac vice*)
Georgia Bar No. 277711
Robert C. Khayat, Jr.
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Attorneys for Defendant
NISSAN NORTH AMERICA, INC.

CERTIFICATE OF SERVICE

I certify that on March 4, 2008, I electronically filed this document with the Clerk of Court using the CM/ECF system, which will send notification of the filing to the following:

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and I certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: Not applicable.

/s/ Andrew T. Bayman
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